

November 26, 2001

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: Verizon's Alternative Regulation Plan, D.T.E. 01-31

Dear Ms. Cottrell:

Enclosed for filing please find the Attorney General's Fifth Set of Document and Information Requests to Verizon Massachusetts, AG-VZ-5-1 to 5-7, together with a Certificate of Service in the above-referenced proceeding.

Sincerely,

Karlen J. Reed  
Assistant Attorney General  
Utilities Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200

KJR/kr

Enc.

cc: D.T.E. 01-31 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications and Energy on )		
its own Motion into the Appropriate Regulatory Plan to succeed Price Cap )	)	
Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' )	)	D.T.E. 01-31
intrastate retail telecommunications services in the Commonwealth )	)	
of Massachusetts )	)	

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**ATTORNEY GENERAL'S  
FIFTH SET OF DOCUMENT AND INFORMATION REQUESTS  
TO VERIZON MASSACHUSETTS**

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 calendar days from receipt of request, as per the Hearing Officer's Ground Rules issued May 7, 2001.

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FIFTH SET OF DOCUMENT AND INFORMATION REQUESTS  
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- AG-VZ 5-1** Please refer to Attachment B to the surrebuttal testimony of AT&T witness Deborah Waldbaum, wherein the witness states "...it is Verizon's policy not to accept an order for [a T1] facility more than 30 days before the requested due date."
- a. Please corroborate that this is in fact Verizon's policy.
  - b. If the response to (a) is in the affirmative, please explain why it is Verizon's policy not to accept an order for a T1 facility more than 30 days before the requested due date.
  - c. If the response to (a) is in the affirmative, please indicate for which types of service this policy applies.
  - d. If the response to (a) is in the affirmative, please provide a copy of Verizon's policy guidelines, training manuals, or any other documents which describe this policy.
- AG-VZ 5-2** Assume for the purposes of this information request that a Verizon retail customer submits a request for transfer of it T1 service from one location in Boston to another, and that this request is made 60 days prior to the required service installation date.
- a. Does Verizon have a similar policy for retail service requests, wherein orders are denied if they are received more than a certain number of days before the requested due date?
  - b. If the response to (a) is in the affirmative, please explain why Verizon maintains

such a policy.

- c. If the response to (a) is in the affirmative, indicate the number of days before the requested due date that retail service requests are denied.
- d. If the response to (a) is in the affirmative, please indicate for which types of service this policy applies.
- e. If the response to (a) is in the affirmative, please provide a copy of Verizon's policy guidelines, training manuals, or any other documents which describe this policy.
- f. If the response to (a) is in the negative, please describe when such a retail service order request would be transferred to the plant department for provisioning.
- g. If the response to (a) is in the negative, please explain why Verizon has different policies regarding acceptance of customer orders depending on whether the request originates from a CLEC wholesale customer or Verizon MA retail customer.

**AG-VZ 5-3** Please refer to Dr. Taylor's November 14, 2001 reply to surrebuttal testimony, page 4, lines 17-23, in which Dr. Taylor asserts that "Verizon MA has no market power in the provision of those services being considered in this proceeding." Does this apply to every Verizon residential and business service throughout each wire center in Massachusetts? If not, to which services and to which wire centers was Dr. Taylor referring?

**AG-VZ 5-4** Please refer to Verizon's response to DTE-VZ 4-3 and the Massachusetts Competitive Profile, Summary Exchange Data (May 2001 data) contained in the September 21, 2001 Rebuttal Testimony of Robert Mudge. Please provide a list of the Massachusetts exchanges that have:

- a. Less than five percent of lines provided by CLECs;
- b. Between five and ten percent of lines provided by CLECs;
- c. Between ten and twenty percent of lines provided by CLECs;
- d. Between twenty and thirty percent of lines provided by CLECs.
- e. Between thirty and forty percent of lines provided by CLECs.
- f. Over forty percent of lines provided by CLECs.

As with your response to DTE-VZ 4-3, please separate business lines from residential

lines in your answer.

- AG-VZ 5-5** Please identify and describe the sources of the information used to respond to AG-VZ 5-4.
- AG-VZ 5-6** Please provide a copy of Verizon MA's most recent monthly Quality of Service Report, including service measurements, Service Quality Index (SQI), monthly actual results for the SQI service measurement, current Wire Center Report, Major Service Outage notifications, installation and maintenance result for public access lines, monthly IntraLATA Presubscription Tracking Report of the Verizon MA toll market share, and compliance report on service quality measures mandated in DTE 99-77 (Town of Athol).
- AG-VZ 5-7** Please provide copies of the monthly Massachusetts IntraLATA Presubscription Tracking Reports for the time period from January 1, 2000, to date as reported to the DTE in Verizon MA's monthly Quality of Service Reports.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Dated at Boston this 26th day of November 2001.

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Karlen J. Reed  
Assistant Attorney General  
Utilities Division  
200 Portland Street, 4th Floor  
Boston, MA 02114  
(617) 727-2200